

OCT 13 1998

## Madera Ranch Project Oversight Committee

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Roger K. Patterson  
Regional Director, Mid-Pacific Region  
U.S. Bureau of Reclamation  
2800 Cottage Way  
Sacramento, CA 95825

October 8, 1998

Dear Mr. Patterson:

As of October 8<sup>th</sup>, 1998, the Madera Ranch Project Oversight Committee has taken action to currently oppose the acquisition of lands in Madera County, by or in conjunction with any federal or state agency, which may ultimately be used for groundwater banking as in the Madera Ranch Groundwater Bank.

Per our discussions with you and documented in our letter dated September 8, 1998, we are currently opposed to any actions that promote the development of the Madera Ranch Groundwater Bank Project (Project) for the following reasons:

### Determination of Technical Feasibility

We believe the appraisal level modeling the U.S. Bureau of Reclamation (Bureau) conducted during Phase 1 is **NOT ADEQUATE** to commence some of the Phase 2 activities identified in the Phase 1 Report (Report). Until the Bureau has conducted adequate site-specific investigations and fully evaluated technical feasibility at a higher level we believe it is unreasonable and imprudent to seek to acquire the land. We are concerned that conducting this project in this fast-track manner will lead to erroneous and damaging decisions.

### No Benefit to Madera County With Potential Adverse Impact

As defined in the Report published by the Bureau, the Project proposes to divert as much as 400 cfs (cubic feet per second) of water from the Mendota Pool on the San Joaquin River through a proposed new canal to the Madera Ranch, with as much as 390,000 acre feet being stored. Water would be pumped out of the underground aquifer bank and returned to the Mendota Pool via the canal for future use by others. No amount of water is designated for Madera County agriculture or City of Madera use during any period of the recharge/extraction cycle. Furthermore, the Report depicts how the level of water in the Project's surrounding aquifer will be lowered 30 - 80 feet more during a drought period. The Project's further reductions in our aquifer would have a profound negative impact.

### Impact to the Quality of Existing Water in the Aquifer

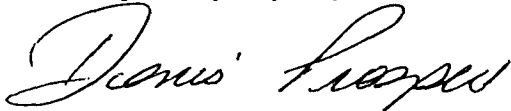
The quality of water in the Mendota Pool which will be used to recharge is of poor quality in comparison to the existing water in the aquifer below the Madera Ranch. Consequently, the overall quality of the water in the aquifer will be degraded. In addition to this quality issue, the Project proposes to percolate the water through the soils of Madera Ranch which are heavily alkali based. We are concerned that this will further degrade the quality of water in the aquifer. These are issues we believe can only be addressed in an Environmental Impact Study (EIR) which we believe is mandatory only after a demonstration of a higher level of feasibility.

### Feasibility of Percolation Through Aquitard (A-Clay Layer)

The Bookman-Edmonston geologic and hydrologic test results which you provided to us on September 9<sup>th</sup>, state "the water has reached the base of the upper aquifer (aquitard or A-Clay layer), but has not been conclusively detected in the lower semi-confined aquifer." However, the tests are then conducted on the lower semi-confined aquifer with the intention to define its storage capability. We believe this is a serious flaw in the technical feasibility of the Project if the recharged water cannot reach the level from which the Bureau intends to extract.

Roger, the opposition to acquisition of the land for the Project is building and is all-encompassing. The following entities have documented their opposition: The Friant Water Users Authority, Madera Irrigation District, Madera County Board of Supervisors, Madera Ranch Project Oversight Committee, Madera County Farm Bureau, Chowchilla Water District, Gravelly Ford Water District and Regional Council of Rural Counties. We urge you to consider this opposition as strong and certain. In comparison, we believe it is highly uncertain that an entity would develop or purchase the land prior to the Bureau performing their studies. Again, we are opposed to the acquisition of the Madera Ranch land which may ultimately be used for groundwater banking prior to the satisfactory completion of comprehensive hydrological, environmental and economical feasibility studies.

Thank you for your prompt attention to this matter.



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cc: Pete Wilson, Governor of California  
Bill Jones, California Secretary of State  
Barbara Boxer, U.S. Senator  
Dianne Feinstein, U.S. Senator  
Newt Gingrich, Speaker of the U.S. House of Representatives  
Gary Condit, U.S. Congressman  
Cai Dooley, U.S. Congressman  
George Radanovich, U.S. Congressman  
Bill Thomas, U.S. Congressman  
Jim Costa, California State Senator  
Dick Monteith, California State Senator  
Dennis Cardoza, California State Assemblyman  
George House, California State Assemblyman  
Robert Prenter, California State Assemblyman  
Michael Spear, U.S. Dept of Fish and Wildlife  
Lester Snow, CALFED  
Madera County Board of Supervisors  
Madera City Council  
Chowchilla City Council  
Dick Moss, Friant Water Users' Authority  
Jason Peltier, Central Valley Project Water Association  
California State Farm Bureau  
Farm Bureau, Counties of Madera, Fresno, Merced, Santa Clara, San Benito,  
Stanislaus, San Joaquin  
Santa Clara Valley Water District